

**UNITED STATES DISTRICT COURT
IN AND FOR DISTRICT OF DELAWARE**

**GRAPHIC ARTS MUTUAL INSURANCE
COMPANY**

Plaintiff,

v.

INDIAN RIVER SCHOOL DISTRICT, *et al.*

Defendants.

Civil Action No. 06-246-JJF

NOTICE OF EXTENSION OF DEADLINES

Pursuant to the Court's Scheduling Order, all parties hereby give notice to the Court that they have agreed to extend the deadline to exchange and complete interrogatories, identify fact witnesses, and produce documents, by fourteen (14) days, and the deadlines for producing expert reports, amendment of pleadings, and dispositive motions by sixty (60) days, pursuant to Paragraph 4(g) of the Rule 16 Scheduling Order. These new deadlines should not affect a trial date, because one has not been set. None of the new deadlines will extend beyond the current date for a pre-trial conference of July 12, 2007. The new deadlines will be as follows:

- The parties will exchange and complete interrogatories, identify fact witnesses, and produce documents by March 5, 2007;
- Reports from retained experts required by Fed. R. Civ. P. 26(a)(2) are due from the plaintiff(s) by April 28, 2007; from the defendant(s) by May 14, 2007;
- All motions to amend the pleadings shall be filed on or before May 30, 2007;
- Any case dispositive motions, pursuant to the Federal Rules of Civil Procedure, shall be served and filed with an opening brief on or before June 11, 2007.

Briefing shall be pursuant to D. Del. LR 7.1.2.

The parties have exchanged initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1) and have exchanged written discovery requests pursuant to Federal Rules of Civil Procedure 33 and 34, but have not yet engaged in depositions and additional discovery in an effort to permit resolution through settlement discussions and therefore this minor extension is necessary to permit the parties to engage in discovery prior to the above pending deadlines. The Scheduling Order permits the parties to extend this deadline "so long as the changes do not cause a delay in any pre-trial conference or trial date set by the Court and so long as the Court does not otherwise order." See Rule 16 Scheduling Order at ¶4.g. This extension will not cause a delay with the pre-trial conference and no trial date has yet been set.

Respectfully submitted,

DRINKER BIDDLE & REATH LLP

/s/ Warren Pratt

Warren Pratt (Del. Bar No. 4334)
1100 N. Market Street, Suite 1000
Wilmington, DE 19801
Telephone: (302) 467-4200
Facsimile: (302) 467-4201

Jason P. Gosselin (*pro hac vice*)
DRINKER BIDDLE & REATH LLP
One Logan Square
18th & Cherry Streets
Philadelphia, Pennsylvania 19103

Attorneys for the Defendants

YOUNG, CONAWAY, STARGATT & TAYLOR LLP

/s/ Timothy Jay Houseal

Anthony G. Flynn (Del. Bar No. 74)
Timothy Jay Houseal (Del. Bar No. 2880)
The Brandywine Building
1000 West Street, 17th Floor
Wilmington, DE 19801
Telephone: (302) 571-6682
Facsimile: (302) 576-3300

Edward J. Grass (*pro hac vice*)
Steven W. McNutt (*pro hac vice*)
HUNTON & WILLIAMS LLP
1751 Pinnacle Drive, Suite 1700
McLean, Virginia 22102

*Attorneys for Graphic Arts Mutual Insurance
Company*

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